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January 14, 2022

**VIA ECF**

Hon. Lewis A. Kaplan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, New York 10007-1312

**Re: *Giuffre v. Prince Andrew, Duke of York*, Case No. 21-cv-06702-LAK**

Dear Judge Kaplan:

We represent Plaintiff Virginia Giuffre. Pursuant to this Court's orders dated November 3, 2021, and December 13, 2021 (ECF Nos. 36, 51), 28 U.S.C. § 1781(b), and the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, Mar. 18, 1970, 23 U.S.T. 2555, 847 U.N.T.S. 231, we respectfully submit this application requesting that the Court issue the enclosed Hague Convention Requests for International Judicial Assistance to the Central Authority of the United Kingdom, in the forms attached hereto as Exhibits 1 and 2.<sup>1</sup>

"The determination to issue letters rogatory is committed to the court's discretion. In making that determination, the court applies the relevance standards of Rule 26 of the Federal Rules of Civil Procedure." *Blagman v. Apple, Inc.*, No. 12 CIV. 5453 ALC JCF, 2014 WL 1285496, at \*4 (S.D.N.Y. Mar. 31, 2014) (citations omitted). Under Rule 26, information that "is relevant to any party's claim or defense" is discoverable. Fed. R. Civ. P. 26(b)(1). "Although not unlimited, relevance, for purposes of discovery, is an extremely broad concept." *Blagman*, 2014 WL 1285496, at \*4 (quoting *Chen-Oster v. Goldman, Sachs & Co.*, 293 F.R.D. 557, 561 (S.D.N.Y. 2013)).

Enclosed are two Letters of Request to the United Kingdom, which seek relevant information under the standard of Rule 26.

**Exhibit 1:** The first attached proposed Letter of Request to the United Kingdom seeks testimony from Shukri Walker, who claims to have seen Prince Andrew at Tramp Nightclub in London with a young girl around the time that Plaintiff contends Prince Andrew abused her in London after visiting Tramp Nightclub. Because Prince Andrew has denied ever meeting Plaintiff or being at Tramp Nightclub during the relevant time period, Ms. Walker's testimony is highly relevant. The attached proposed Letter of Request to the United Kingdom seeks the permission of the Senior Master of the Royal Courts of London in deposing this witness in the United Kingdom,

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<sup>1</sup> Both the United States and the United Kingdom are both parties to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters. See <https://www.hcch.net/en/instruments/conventions/status-table/?cid=82>.

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and identifies the topics for the proposed deposition.

Exhibit 2: The second attached proposed Letter of Request to the United Kingdom seeks testimony from Robert Olney, a resident of the United Kingdom. Mr. Olney is Prince Andrew's former equerry (or assistant). Plaintiff has reason to believe that Mr. Olney has relevant information about Prince Andrew's relationship with Jeffrey Epstein, as Mr. Olney's name appears in publicly available copies of Epstein's phone book (or "Black Book"). The attached proposed Letter of Request to the United Kingdom seeks the permission of the Senior Master of the Royal Courts of London in deposing Mr. Olney in that country, and identifies the topics for the proposed deposition.

If the attached proposed Letters of Request are acceptable to the Court, we respectfully request that Your Honor endorse these letter applications, and take the following actions:

1. Plaintiff respectfully requests that Your Honor sign both of the duplicates for each Letter of Request attached to the hand-delivered copy of this application.
2. Plaintiff respectfully requests that Your Honor then direct the Clerk of the Court to:
  - a. apply the seal of the Court to both signed copies of each Letter of Request;
  - b. file a copy of each signed Letter of Request on the docket of this action; and
  - c. return the two signed copies of each Letter of Request and Commission to undersigned counsel to be transmitted to the designated Hague Convention Central Authority, at the below address.

The Senior Master  
For the attention of the Foreign Process Section  
Room E16  
Royal Courts of Justice  
Strand  
LONDON WC2A 2LL

We will send a messenger to the Courthouse to pick up all originals from the Clerk's Office once executed.

Thank you for your consideration of this request.

Respectfully yours,

/s/ Sigrid McCawley  
Sigrid McCawley

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